

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SALON PHOENIX COSMETOLOGY LLC and
SALON HAIRROIN, INC., on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

GROUPON, INC.,

Defendant.

Case No. 1:22-cv-07162

Hon. Lindsay C. Jenkins

**PLAINTIFFS' UNOPPOSED
MOTION FOR
PRELIMINARY
SETTLEMENT APPROVAL**

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*Attorneys for Plaintiffs and the
Proposed Settlement Class*

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law in support of this motion, Plaintiffs Salon Phoenix Cosmetology LLC and Salon Hairroin, Inc. will move this Court, before the Honorable Lindsay C. Jenkins, Judge of the United States District Court for the Northern District of Illinois, at the United States District Courthouse, located at 219 South Dearborn Street, Chicago, Illinois, 60604, at a time and place to be scheduled by this Court, for an order:

- (1) granting preliminary approval of the Settlement Agreement;
- (2) conditionally certifying the Settlement Class solely for purposes of this Settlement Agreement, and appointing (a) Salon Phoenix Cosmetology LLC and Salon Hairroin, Inc. as representatives of the Class, and (b) Raphael Janove of Pollock Cohen LLP as Class Counsel for the Class;
- (3) approving the proposed notice plan and the deadlines to object to the Settlement;
and
- (4) scheduling a hearing pursuant to Fed. R. Civ. P. 23(e) to determine whether the proposed Settlement (a) is fair, reasonable, and adequate, and (b) should be finally approved and an appropriate judgment entered.

Dated: August 7, 2023

Respectfully Submitted,

By: /s/ Raphael Janove

Raphael Janove

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